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Attorney for Debtor

United States Bankruptcy Court
District of New Jersey

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In Re: **Chapter 13**

Michael Sinisi

Case No.: 18-13663

Honorable John K. Sherwood

**NOTICE OF MOTION TO APPROVE SALE
OF REAL PROPERTY**

ORAL ARGUMENT ONLY REQUESTED
IF OPPOSITION IS FILED

DATE: June 14, 2018
TIME: 11:00 a.m.

Debtor

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TO:

Marie-Ann Greenberg
Chapter 13 Standing Trustee
30 Two Bridges Road, Suite 330
Fairfield, NJ 07004

Michael Sinisi
10 Carmella Court
Cedar Grove, NJ 07009

All Creditors - See Attached Creditors Matrix

The debtor has filed papers with the Court for an Order to approving the sale of real property; and for other such relief as the Court may deem appropriate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief contained in bold above in the above-named debtor's case, or if you want the Court to consider your views on the motion, then within seven (7) days prior to the scheduled hearing you or your attorney must:

File a written response in opposition to this motion explaining your position(s) and send it to:

Clerk
United States Bankruptcy Court
King Federal Building
50 Walnut Street -- 3rd Floor
Newark, NJ 07102

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

James J. Fitzpatrick, Esq.
Fitzgerald & Crouch, PC
649 Newark Avenue
Jersey City, NJ 07306-2303

Marie-Ann Greenberg
Chapter 13 Standing Trustee
30 Two Bridges Road, Suite 330
Fairfield, NJ 07004

IF YOU OPPOSE THE RELIEF REQUESTED HEREIN YOU SHOULD ATTEND THE HEARING SCHEDULED TO BE HELD BEFORE

Honorable: John K. Sherwood
Date: June 14, 2018
Time: 11:00 AM
Place:


United States Bankruptcy Court
King Federal Building
50 Walnut Street -- 3rd Floor,
Newark, NJ 07102

Pursuant to D.N.J. LBR 9013-2(a) et seq., if you wish to contest the within motion, you must file with the Office of the Clerk of the Bankruptcy Court, responding papers stating with particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is enclosed with this Motion.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Statement of Non-Necessity of Brief: The movant certifies pursuant to D.N.J. LBR 9013-2 that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

DATED: May 8, 2018



James J. Fitzpatrick, Esq.
Attorney for Debtor